

TECHNICAL REVIEW DOCUMENT
For
REOPENING / MODIFICATION TO OPERATING PERMIT 96OPMR129

Public Service Company – Pawnee Station
Morgan County
Source ID 0870011

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July 2011
Revised August 15, 2011

I. Purpose:

This document establishes the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the reopening and modification of the Operating Permit for the Pawnee Station. The renewal Operating Permit for this facility was issued on January 1, 2010 and expires on January 1, 2015. During processing of the Title V renewal permit, a petition was filed requesting that EPA object to the issuance of the renewal permit. On June 30, 2011, EPA issued a response to that petition, partially granting and denying the petition to object to the renewal permit. In their response to the petition EPA indicated that the Division must ensure that the permit contain conditions sufficient to assure compliance with the opacity limits for the ash silo, soda ash silo, soda ash day tanks and sorbent silos (Section II, Condition 5.6) and that the Division must provide for monitoring sufficient to assure compliance with the opacity limits for the transfer tower/tripper deck and crusher baghouses (Section II, Conditions 5.7 and 5.8). Therefore, the Division has initiated a reopening of the Pawnee Title V permit to address the deficiencies noted in EPA's Order responding to the petition. The Division sent a reopening notice to Public Service Company of Colorado (PSCo) on July 7, 2011 regarding the modifications to address EPA's June 30, 2011 Order.

Prior to the EPA's Order regarding the petition, PSCo submitted a request on June 16, 2011 to modify their Title V permit. The requested modifications qualify as administrative amendments. PSCo's June 16, 2011 modification application shall be processed with the Division's reopening of the permit. In accordance with the requirements in Colorado Regulation No. 3, Part C, Section XIII.A.6, only those provisions for which there is cause to reopen are subject to the reopening procedures. Therefore, only the provisions that are specifically identified as part of the reopening are subject to public comment.

This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the Division's reopening with respect to the deficiencies noted in EPA's June 30, 2011 Order, PSCo's June 16, 2011 modification application, comments on the draft permit and technical review document received on August 12, 2011 via e-mail, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant.

Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Description of Permit Modification Request/Modification Type

The source submitted a modification request on June 16, 2011. The requested modification was to correct the permit condition numbers referenced in Conditions 9.5.2 and 9.5.3 and to correct the descriptions of some of the insignificant activities identified in Appendix A. The Division considers that the requested changes fall under the category of administrative amendments as defined in Colorado Regulation No. 3, Part A, Section I.B.1. As specified in Colorado Regulation No. 3, Part A, Section III.E, public notice is not required for administrative amendments.

In EPA's June 30, 2011 Order responding to a petition filed regarding the Title V renewal permit for this facility, EPA noted two deficiencies for which the permit must be revised. Therefore, the Division is reopening the permit to address the deficiencies noted in the June 30, 2011 EPA Order. Reopenings are subject to the same procedures for initial or renewal permit issuance, including a 30-day public comment period and a 45-day EPA review. However, only those portions of the permit that are subject to reopening are subject to public comment.

III. Modeling

The requested revisions do not change any actual emission rates and/or permitted emission limitations; therefore, no modeling is required.

IV. Discussion of Modifications Made

PSCo's June 16, 2011 Administrative Amendment

PSCo submitted an application on June 16, 2011 to modify the permit for Pawnee Station. The requested modifications were to correct some references to permit conditions and to correct the description of two tanks included in the insignificant activity list. The June 16, 2011 modification application indicated that these were administrative amendments and the Division agrees with that assessment. Since these modifications

qualify as administrative amendments and are not part of the reopening, these provisions are not subject to public comment. In accordance with the requirements in Colorado Regulation No. 3, Part C, Section XIII.A.6, only those provisions for which there is cause to reopen are subject to the reopening procedures.

The following revisions were made to address PSCo's June 16, 2011 administrative amendment request:

Section II, Conditions 9.5.2 and 9.5.3

- The reference to "Condition 12.6.1" in Condition 9.5.2 was corrected to "Condition 9.5.1".
- The reference to "Condition 8.6.1" in Condition 9.5.3 was corrected to "Condition 9.5.1".

Appendix A, Insignificant Activity List

- The description of the diesel fuel tank for the emergency generator was revised to indicate it is a 550 gal tank, rather than a 575 gal tank

Note that this tank is considered an insignificant activity based on tank contents (diesel fuel) and annual throughput (400,000 gal/yr). Therefore, the fact that the tank is smaller than previously indicated does not affect the insignificant activity status of the tank. This tank serves an emergency generator that runs less than 100 hours per year, so actual throughput through this tank is well below the insignificant activity level of 400,000 gal/yr.

- The description of the hydrogen seal oil tank was revised to indicate it is a 350 gal tank, rather than a 840 gal tank.

Since the tank is smaller than previously indicated, emissions would be lower, therefore, this change does not affect the insignificant activity status of the tank.

August 12, 2011 Comments

In general the changes requested in PSCo's August 12, 2011 comments would qualify as an administrative amendment. Since these modifications qualify as administrative amendments and are not part of the reopening, these provisions are not subject to public comment. In accordance with the requirements in Colorado Regulation No. 3, Part C, Section XIII.A.6, only those provisions for which there is cause to reopen are subject to the reopening procedures.

The following changes were made to address PSCo's August 12, 2011 comments on the draft permit:

- PSCo has indicated that only one sorbent silo was installed at the facility. Therefore, the following changes were made to the permit to reflect this:

- Revised the description in Section I, Condition 1.1 to indicate one sorbent silo.
- Revised the tables in Section I, Condition 6.1 and Appendices B and C to indicate there is one sorbent silo.
- The summary table heading in Section II, Condition 5 was revised to indicate one sorbent silo
- The summary table for the sorbent silos in Section II, Condition 5 was revised to indicate that startup notice (Condition 5.11) is due 30 days “before” startup.

Reopening to Address EPA’s June 30, 2011 Order

Section II, Condition 5.6

EPA’s June 30, 2011 stated the following with respect to the petitioner’s claims regarding Section II, Condition 5.6 of the permit:

CDPHE has not given an adequate rationale for why the Permit does not require records of the GEP practices or otherwise require monitoring to assure opacity limits for the ash silo, soda ash silo, soda ash day tanks, and sorbent silos are met. The EPA grants the petition on this issue. CDPHE must ensure the permit contains conditions sufficient to assure compliance with the opacity limits for these sources. These conditions may include records of actions taken to meet the requirements of Condition 5.6, including Condition 5.2.1.2. and any other conditions referenced in 5.6 that do not already have records associated with them. Alternatively, CDPHE may develop other conditions sufficient to assure compliance with the opacity limitations in Condition 5.6, consistent with the requirements in the Colorado SIP and requirements under title V. (June 30, 2011 EPA Order, page 19)

In order to address the EPA’s petition order, the Division added requirements to keep records of good engineering practices. In addition, the Division clarified that written operating and maintenance procedures are to be maintained and made available to the Division upon request. Specifically, the following changes have been made to the permit to address EPA’s Order:

- The following language was added to Conditions 5.6.2 and 5.6.3 :

A copy of the operating and maintenance procedures, schedules for maintenance and/or inspection activities and records related to the operation and maintenance of the bin vent filters and good engineering practices, such as records of routine maintenance and/or inspections shall be maintained and made available to the Division upon request.

- The last sentence in Condition 5.2.2 was revised to specify that the bin vent filters on the soda ash silos and day tanks be operated and maintained in accordance with the requirements in Condition 5.6.2.
- The following language was added to Condition 5.2.1.2:

A copy of written procedures for proper hose attachment and maintenance, as well as records related to the maintenance of the hose and good engineering practices, such as records of hose inspections, repair or replacement shall be maintained and made available to the Division upon request.

EPA's Order specifically addressed the petitioner's concerns related to Section II, Condition 5.6 of the permit. Condition 5.6 of the permit addresses opacity requirements for the ash silo, the soda ash silo, soda ash day tanks and sorbent silos and includes three sub-conditions that address monitoring requirements for each emission unit. As discussed above Conditions 5.6.2 and 5.6.3 (opacity monitoring for all but the ash silo) were revised to require that records of good engineering practices be kept. Condition 5.6.1 relies upon Conditions 5.2.1.1 and 5.2.1.2. As discussed above, the Division revised Condition 5.2.1.2 to require that records of good engineering practices be kept. Condition 5.2.1.1 specifies that the boiler baghouse be operated and maintained in accordance with the requirements in Condition 8.1. (Note that monitoring was included for the boiler baghouse because, as discussed in the original technical review document (page 41), when the ash silo is loaded, emissions are vented through the boiler baghouse.) The language in the current Title V permit for Pawnee, requires that records be kept. Therefore, no revisions were made to Condition 8.1.

Section II, Conditions 5.7 and 5.8

EPA's June 30, 2011 stated the following with respect to the petitioner's claims regarding Section II, Conditions 5.7 and 5.8 of the permit:

The EPA grants on Petitioner's claim regarding Method 9 testing. CDPHE must provide for monitoring sufficient to assure compliance with the opacity limits for the transfer tower/tripper deck and crusher baghouses in Condition 5.7 or provide a sufficient rationale for why annual observations are sufficient. In identifying monitoring sufficient to assure compliance, CDPHE may include terms and conditions such as those required in the NSPS Subpart Y [See 40 C.F.R. § 60.255(f)(1)(i)], or other monitoring that the State determines is sufficient to assure compliance. (June 30, 2011 EPA Order, page 21)

The Division considers that even though there are baghouses at the transfer tower/tripper deck and crushers, there are several other measures taken and/or other operational factors that reduce dust from the transfer of coal, which would make it unlikely that the opacity limit would be exceeded at either baghouse outlet. All of the

conveyors are enclosed and the crushers are enclosed, this is the primary means to control particulate emissions from these sources. Water sprays are used at the rail car dumper and crushers to further reduce dust. In addition, there is little variability in emissions from the conveyors and crushers, the crushers and conveyors process material at a single rate (i.e., speed is not variable). The baghouses are equipped with bag leak detectors, which detect particulate emissions at the baghouse outlet. When the bag leak detectors sense particulate emissions, an alarm signal is sent to the coal handling control room and the baghouses are shutdown (blowers and fans cease operation) and must be manually restarted. Although the baghouses may be shutdown if particulates are detected by the bag leak detectors, coal crushing and conveying does not cease. However, because the blowers and fans are not operating it is unlikely that particulate emissions would vent through the baghouse outlet. Enclosures remain the primary control measure for particulate emissions from the coal conveyors and crushers, with additional dust suppression provided by the water sprays.

With respect to EPA's order regarding Section II, Conditions 5.7 and 5.8, the Division has made the following changes to the permit:

- Condition 5.7 was revised to require the following:
 - Monthly Method 22 observations of the transfer tower/tripper deck and crusher baghouses. Based on results of the Method 22 observations, Method 9 opacity observations may be required.

The Division considers that monthly visible emission observations will provide a greater degree of assurance that the opacity limits are not exceeded, than the annual Method 9 observations in the current permit. .

- Method 22 observations when a bag leak detector alarms. Based on the results of the Method 22 observation, a Method 9 opacity observation may be required.

The Division considers that a bag leak detector alarm is a valid indication of particulate emissions to the atmosphere. As previously stated, when the bag leak detector alarms, the baghouse is shutdown (i.e. blower and fans cease operation) and must be manually restarted, although coal conveying and crusher does not cease. While it is unlikely that emissions will vent through the baghouse outlet when the baghouse is shutdown, it is possible that emissions may vent at other points within the coal handling system, so the Division is requiring a Method 22 observation. Ideally, this observation would be made prior to restart of the baghouse, as that would be the most likely period during which visible emissions may occur. However, the Division also considers that the restart of the baghouse should not be unnecessarily delayed due to the need to conduct a Method 22 observation. As a result, the permit specifies that the observation shall be made as soon as practicable after the bag leak detector alarm signal is sent. The Division is also requiring that records be kept of the date and time the bag leak detector signal is sent, the Method 22 observation is conducted and the baghouse is manually restarted.

- Operation of the bag leak detectors on the transfer tower/tripper deck and crusher baghouses.

Performance tests were conducted on these baghouses in 2003 and no visible emissions were observed during the three hour period. The permittee conducted 6 minute Method 9s on the baghouses in December 2010 and no visible emissions were seen. Previous testing has indicated that the likelihood of exceeding the opacity limit is low and particulate emissions do not vary much (conveyors and crushers operated at constant speed). The transfer tower/tripper deck and crusher baghouses are equipped with bag leak detectors, which monitor the presence of particulates at the baghouse outlets. Daily checks of the coal handling system are conducted when the coal handling system is operated. During these checks breaches in the enclosures or problems with the conveyor belts or water spray can be detected. Generally, few problems are encountered with the enclosures or water sprays which are the primary control measures for particulate matter emissions. For all of these reasons, the Division considers that monthly visible emission observations are sufficient to assure compliance with the opacity standard.

The opacity limit in Condition 5.8 (NSPS Y) is slightly lower than the opacity limitation in Condition 5.7 (Reg 1). The NSPS opacity standard is for opacity emissions to be less than 20%, while the Reg 1 standard is for opacity emissions not to exceed 20%. Therefore, the NSPS opacity limit is slightly more stringent than the Reg 1 opacity limit. In addition, the Reg 1 opacity limit applies at all times but the NSPS opacity limit does not apply during periods of startup, shutdown and malfunction (per 40 CFR Part 60 Subpart A § 60.11(c)). As a result neither opacity requirement is more stringent than the other at all times.

Nevertheless the monitoring conducted for the Reg 1 opacity limit (Condition 5.7) is sufficient monitoring to assure compliance with the NSPS Y opacity requirement (Condition 5.8). In the renewal permit, the monitoring required for the NSPS Y opacity requirement (in Condition 5.8), relied upon the monitoring in Condition 5.7. EPA's Order indicated a concern that the monitoring in Condition 5.7 (annual Method 9s was insufficient) but did not indicate a problem with the language in Condition 5.8. The equipment listed in Condition 5.8 indicates the equipment that is subject to NSPS Y. There are some enclosed conveyors that are subject to the Reg 1 opacity requirements in Condition 5.7 but not the opacity requirements in Condition 5.8. The equipment listed in Condition 5.8 includes the transfer tower/tripper deck and crusher baghouses. Minor language changes were made to Conditions 5.8.1 and 5.8.2 to rely on the additional monitoring added to Condition 5.7. In addition, the Division added language to this condition to clarify that the equipment subject to this condition includes the transfer tower/tripper deck and crusher baghouses.

In addition, although not specifically noted in EPA's June 30, 2011 Order, the Division revised Condition 5.1.1 to require that records of good engineering practices be kept and to clarify that written operating and maintenance procedures are to be maintained and made available to the Division upon request. Although Condition 5.4.2 requires that records be kept of quarterly baghouse inspections, it's not clear that records of good

engineering practices such as routine or preventative maintenance activities must also be kept, hence the Division revised Condition 5.1.1.

Other Revisions Subject to Permit Reopening Procedures

The Division has identified other portions of this permit that require revisions due to changes in requirements for some equipment located at this facility. Although as discussed for each action, these changes could be processed as minor modifications, and would not otherwise be subject to public comment, the Division considers that since a reopening is in progress, these changes will be considered part of the reopening action and subject to public comment. The Division sent a reopening notice to PSCo on July 13, 2011 regarding these additional changes.

“New” Section II.15 – Emergency Compression Ignition Engines

There are two engines included in the insignificant activity list that are considered insignificant activities under either the provisions in Colorado Regulation No. 3, Part C, Sections II.E.3.nnn (emergency generators) or xxx (stationary internal combustion engines). However, under the “catch-all” provisions in Regulation No. 3, Part C, Section II.E, sources that are subject to any federal or state applicable requirement, such as National Emission Standards for Hazardous Air Pollutants (NESHAPs), may not be considered insignificant activities.

EPA promulgated NESHAP requirements for Reciprocating Internal Combustion Engines (hereafter referred to as “RICE MACT”) on June 15, 2004 and the requirements applied to new and existing engines greater than 500 hp located at major sources of HAPs. Under the initial rules, existing (commenced construction or reconstruction before December 19, 2002) emergency engines located at major sources of HAPs were not subject to any requirements (including initial notification) per 63.6590(b)(3). The emergency generator that is in the insignificant activity list is 755 hp and was first placed in service in 1980. Therefore the emergency generator is an existing emergency engine greater than 500 hp located at a major source of HAPs and is not subject to the RICE MACT requirements. As a result, this engine will remain in the insignificant activity list.

EPA promulgated revisions to the RICE MACT on March 3, 2010 which apply to existing (commenced construction or reconstruction before June 12, 2006) compression ignition engines of 500 hp or less located at major sources of HAP emissions. The emergency fire pump engine is 230 hp and was first placed in service in 1980. Therefore, it is subject to the March 3, 2010 revisions to the RICE MACT and it can no longer be considered an insignificant activity. Although the unit cannot be considered an insignificant activity, the Division has not adopted the March 3, 2010 revisions to the RICE MACT, so the engine is still exempt from APEN reporting and minor source construction permit requirements. The emergency fire pump engine will be included in “new” Section II.15 of the permit.

Colorado Regulation No. 3, Part C, Section I.A.7.b specifies that “any change that is considered a modification under Title I of the Federal Act” be processed as a significant permit modification. Appendix G of Regulation 3 describes more specifically what

constitutes a modification under Title I of the Federal Act. Appendix G (Section I.L, revisions adopted July 15, 1993, Subsection I.G for modifications) indicates that a modification which triggers either 111 (new source performance standards (NSPS)) or 112 (national emission standards for hazardous air pollutants (NESHAP)) requirements, are considered Title I modifications. In general, the Division has considered that modifications that trigger either NSPS or NESHAP requirements that consist only of non-substantive requirements, such as work practice standards or recordkeeping requirements can generally be processed as a minor modification. This is consistent with Division policy (PS Memo 99-06, revised February 27, 2008) regarding public comment requirements. PS Memo 99-06, specifies that public comment would not be required for area sources that are subject to non-substantive MACT requirements, such as recordkeeping or work practice requirements. Although this policy specifically applies to public comment requirements for area sources subject to non-substantive MACT requirements, this policy can be reasonably applied to major sources of HAPS that are subject to non-substantive MACT requirements. Nevertheless, as stated previously, even though this modification could be processed as a minor modification, the Division considers that it is subject to the reopening provisions, including public comment and EPA review.

The engine description is as follows:

One (1) Detroit Allison, Model No. 70847010, Serial No. 8VA387829, diesel-fired engine, Rated at 230 hp, with a fuel rate of 20 gal/hr (2.74 mmBtu/hr, based on a diesel fuel heat content of 137,000 Btu/gal) and displacement of (1.2 liters per cylinder)

The appropriate applicable requirements for this engine are as follows:

- Except as provided for below, visible emissions shall not exceed 20% opacity (Reg 1, Section II.A.1)
- Visible emissions shall not exceed 30% opacity, for a period or periods aggregating more than six (6) minutes in any sixty (60) minute period, during fire building, cleaning of fire boxes, soot blowing, start-up, process modifications, or adjustment or occasional cleaning of control equipment, when burning coal (Reg 1, Section II.A.4)

Based on engineering judgment, the Division believes that the operational activities of fire building, cleaning of fire boxes and soot blowing do not apply to diesel engines. In addition, since this engine is not equipped with control equipment the operational activities of adjustment or occasional cleaning of control equipment do not apply to this engine. Finally, based on engineering judgment, it is unlikely that process modifications will occur with these emergency engines. Therefore, for these units the 30% opacity provision only applies during startup. The 20% opacity requirement (noted in the above bullet) applies at all other times. Note 40 CFR Part 63 Subpart ZZZZ (table 2c, item 1 and § 63.6625(h)) specifies that startup shall not exceed 30 minutes

- SO₂ emission shall not exceed 0.8 lbs/mmBtu (Reg 1, Section VI.B.4.b.(i)).
- 40 CFR Part 63 Subpart ZZZZ requirements – management practices (oil and filter change, inspect air cleaner and inspect hoses and belts)
- 40 CFR Part 63 Subpart A requirements

Since this engine is not subject to any emission limitations, monitoring requirements, notification and reporting requirements the requirements in §§ 63.7, 63.8, 63.9 and 63.10 do not apply. In addition, since this engine is existing the requirement in § 63.5 (preconstruction review and notification requirements) does not apply. Finally, Table 8 of Subpart ZZZZ indicates that operation and maintenance requirements in 63.6(e) do not apply. Therefore, the permit will only include the prohibition and circumvention requirements in § 63.4.

Since this unit is not subject to APEN reporting or minor source construction permit requirements, the permit will not include any requirements for calculating emissions.

Compliance with the opacity limit shall be monitored by conducting a Method 9 observation annually to monitor compliance with the 20% opacity requirement. If the engine operates for 250 hours in a calendar year, another Method 9 observation will be required. Since periods of startup are limited to 30 minutes a Method 9 observation to monitor compliance with the 30% opacity requirement will not be required.

Section II, Condition 3.6

The language in Section II, Condition 3.6 refers to a future requirement for a case-by-case 112(j) MACT application. However, EPA promulgated final requirements for Industrial, Commercial and Institutional Boilers and Process Heaters in 40 CFR Part 63 Subpart DDDDD; therefore, a case-by-case 112(j) MACT application is no longer required. The final rule does not include emission limits for natural gas or refinery gas fired units but instead specifies work practice requirements.

As discussed above for the emergency fire pump engine, the Division considers that since the requirements for natural gas fired boilers are work practice standards, rather than emission limitations, that this modification might otherwise have been processed as a minor modification. However, since the Division is incorporating this change with a reopening, we are considering that this revision will also be considered part of the reopening and subject to public comment.

The appropriate applicable requirements have been included in Section II, Condition 3.6 of the permit. As noted in the May 18, 2011 Federal Register, EPA has delayed the effective date of the final rule until such time as judicial review is no longer pending or until the EPA completes its reconsideration of the rules, whichever is earlier. Therefore, the Division will note in the permit that the effective date of the rule has been delayed indefinitely.

Section II.14 – Regional Haze Requirements – Unit 1

Unit 1 is subject to regional haze requirements for best available retrofit technology (BART) and as such a BART analysis was conducted and a construction permit (07MR0111B) was issued on September 12, 2008 to address the BART requirements. The requirements in the BART construction permit (07MR0111B) were included in Section II.14 of the Title V renewal permit. The emission limitations included in the BART construction permit (which were also included Reg 3, Part F) was part of the Division's regional haze state implementation plan (SIP) that was submitted to EPA Region 8 in 2009. EPA indicated that the SIP was not approvable; therefore, the Division addressed the issues raised by EPA and the regional haze requirements for BART units were included in Colorado Regulation No. 3, Part F, which was adopted by the AQCC in January 2011. Since the BART analyses conducted in 2007-2008 were revised and replaced by the January 2011 changes to Regulation No. 3, Part F, PSCo requested that their BART construction permit (07MR0111B) be canceled on April 27, 2011.

Since Colorado Construction Permit 07MR0111B has been canceled the provisions in Section II.14 have been removed and replaced with the revised regional haze requirements that were included in Colorado Regulation No. 3, Part F. The requirements in Reg 3, Part F include emission limitations as well as monitoring, recordkeeping and reporting requirements. The provisions in Reg 3, Part F are state-only enforceable until EPA approves Colorado's Regional Haze SIP. In addition to including the Reg 3, Part F requirements, the Division made the following changes:

- Language was added to Section II.14 to indicate how the 24-hour opacity compliance assurance monitoring (CAM) indicator would be set for the regional haze PM limit. The 24-hour opacity limit will be set in the same manner as the permit currently requires for the Reg 1 PM limit but since the regional haze PM emission limitation is lower than the PM limit that currently applies to Unit 1 (0.03 lb/MMBu vs. 0.1 lb/MMBtu), the Division considers that the opacity add-on should be lower and has set the maximum opacity add-on at 3.5%. The opacity add-on is still higher than the 2.5% opacity add-on allowed under NSPS Da (upon which the CAM monitoring is based) but since the regional haze PM limit is still higher than the NSPS Da limit (0.03 lb/MMBtu vs. 0.015 lb/MMBtu), the Division considers that a higher opacity add-on is appropriate.
- Language was added to Section II, Condition 1.1, indicating that beginning with the compliance date for the regional haze PM limit, that compliance with the Reg 1 PM limit is presumed provided the monitoring conducted for the regional haze PM limit indicates compliance with the regional haze PM limit. This is an appropriate revision since the regional haze limit is more stringent than the Reg 1 PM limit (0.03 lb/MMBtu vs. 0.1 lb/MMBtu).
- Minor changes were made to the language regarding CAM excursions in Condition 1.15.1.2 to address the method used to set the 24-hour opacity indicator for the regional haze PM limit.

- Minor changes were made to the CAM Plan (Appendix H) to address the regional haze PM limit. Except for the opacity add-on used to set the 24-hour opacity indicator, the CAM plan is the same for the regional haze PM limit as it is for the Reg 1 PM limit that currently applies. Performance tests conducted in the past for the Reg 1 PM limit indicate compliance with the future regional haze PM limit.
- The reporting of excursions (from CAM indicators) that is included in Reg 3, Part F, Section VII.E for BART sources was streamlined from the permit (included in the table in Section IV.3 of the permit), since reporting of excursions is already required under the CAM requirements.
- The provisions in Section II.14 were identified as a state-only requirement in Section I, Condition 1.4 of the permit.

Other Modifications

In addition to the modifications requested by the source and the modifications made as part of the reopening, the Division used this opportunity to include changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this modification.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments on other permits, to the Pawnee Station Operating Permit with this reopening. The Division considers that these changes would qualify as administrative amendments. As such, these changes are not subject to the reopening provisions and are not subject to public comment. These changes are as follows:

Page following cover page

- Changed the responsible official and the permit contact.
- Included the full company name (i.e., “Public Service Company of Colorado”, rather than “Public Service Company”). Note that this change is also reflected in the headers and footers and in the example reports in Appendices B and C.
- Changed the company address

Section 1 – General Activities and Summary

- Revisions to the table in Condition 6.1 were made to clarify the baghouses listed as control devices. For example during silo loading, emissions vent through the boiler baghouse.

Section II.1 – Unit 1 (Coal Fired Boiler)

- Identified the numerical opacity standard in the text in Conditions 1.11 through 1.13.

Section II.3 – Auxiliary Boiler

- Condition 3.3.1 should be identified as Condition 3.4 (as indicated in the summary table). This was corrected.

Section III – Acid Rain Requirements

- Revised the designated representative and alternate designated representative.

Section V – General Conditions

- Changed the version date.
- Some minor format and language changes were made to Condition 29 (VOC). The primary change was the addition of a paragraph indicating to which types of areas (e.g. ozone nonattainment) the various requirements apply to.

Appendix D

- Changed the Division contact for reports.